JOINT STATUS REPORT RE: SETTLEMENT AND REQUEST TO CONTINUE THE LAST DAY TO FILE THE STIPULATION TO DISMISS THE CASE

TO THIS HONORABLE COURT:

19

20

21

22

23

24

25

26

27

28

Defendants.

Plaintiffs A.H. and H.H, in each case a minor, by and through their guardian *ad litem* Crystal Hanson, CHLOE HOLLAND, and PATRICIA HOLLAND, individually, and Defendants COUNTY OF SAN BERNARDINO and JUSTIN LOPEZ ("the Parties"), by and through their respective attorneys of record hereby submit the following joint status report regarding the settlement of this matter.

1. On December 16, 2024, this Court granted Plaintiffs' Minor's

Case	5:23-cv-01028-JGB-SHK Document 45 Filed 12/17/24 Page 2 of 2 Page ID #:729
1 2 3 4 5 6 7	Compromise Petition. (Dkt. No. 44). 2. Defendants anticipate funding the minor plaintiff's annuity accounts and transmitting the remaining funds to Plaintiffs' counsel within approximately two weeks. 3. Plaintiffs' counsel anticipates that it will take approximately 10 days after receipt of the check for the check to clear the bank. 4. Based on the foregoing, the Parties respectfully request that this Court
8	continue the deadline to file a stipulation to dismiss the case to January 17,
9	2025, to allow the Parties to fully consummate the settlement.5. The Parties shall file a stipulation to dismiss the entire case after the check
11	made payable to Pacific Life & Annuity Services is received by Plaintiffs'
12	settlement broker and after the check made payable to "Law Offices of
13	Dale K. Galipo, Client Trust Account" has cleared the bank.
14	6. GOOD CAUSE exists for this request because the Parties are working
15	together to consummate the settlement.
16	IT IS SO STIPULATED.
17	
18	Respectfully submitted.
19	
20	DATED: December 17, 2024 MANNING & KASS ELLROD, RAMIREZ, TRESTER LLP
21	By: s/ Kayleigh A. Andersen
22	Eugene P. Ramirez, Esq. Kayleigh A. Andersen, Esq. Attornevs for Defendants
23	Attornevs for Defendants
24	DATED: December 17, 2024 LAW OFFICES OF DALE K. GALIPO
25	By:s/Renee V. Masongsong
26 27	Dale K. Galipo, Esq. Renee V. Masongsong, Esq. Attornevs for Plaintiffs
28	Attornevs for Plaintiffs
20	

-2-STIPULATION TO CONTINUE THE LAST DAY TO FILE THE STIPULATION FOR DISMISSAL